

Determination of NEPA Adequacy (DNA)
U.S. Department of Interior
Bureau of Land Management

OFFICE: *Sonoran Desert National Monument (SDNM)*

NEPA/TRACKING NUMBER: *DOI-BLM-AZ-P040-2013-0002-DNA*

CASEFILE/PROJECT NUMBER: *N/A*

PROPOSED ACTION TITLE/TYPE: Southern Arizona Project: Vehicle Barriers, Route Restoration, and Trash Cleanups

LOCATION/LEGAL DESCRIPTION: Sonoran Desert National Monument

APPLICANT (if any): *N/A*

A. Description of the Proposed Action and any applicable mitigation measures

This project will provide for the installation of several vehicle barriers, reclaim illegal vehicle routes and footpaths used during the course of human and drug smuggling, and clean-up dispersed litter and trash accumulations. The work will occur in the Table Top Wilderness and adjacent areas of the Sonoran Desert National Monument. The project will gather, bag, and remove trash accumulations from illicit “layup” (or camp and hiding) sites used by smugglers, as well as dispersed litter along designated vehicle routes and washes. Route restoration will take place following conclusion of clean-up activities and may involve use of a backhoe and/or hand tools and “vertical mulching” techniques to obscure routes.

This clean-up effort will take place from December 1, 2012 through May 31, 2013. During the course of the project, access to wilderness by motor vehicle may be used, but is not anticipated. Past projects have located and removed large quantities of debris and smuggling trash deep inside the Table Top Wilderness, which required the use of motor vehicles both for law enforcement and project work. Such large concentrations have not been identified for this project; however, scattered debris remains and may require occasional vehicle use for removal. It is estimated that during this period up to two vehicle incursions into wilderness may occur per day in areas with the most trash and refuse. In rare instances, aircraft may be utilized for sling-load removal of very large trash loads and/or areas that are difficult to access.

Vehicle barriers have been identified for several locations where smugglers gain access to the Table Top Wilderness or adjacent areas of the SDNM and have created unauthorized vehicle routes during the course of criminal smuggling activities. These locations are identified on the attached map. These sites are in addition to locations identified during the course of last year’s operations (NEPA # DOI-BLM-AZ-P040-2011-007-DNA). The

BLM believes that barriers located on the Tohono O'odham Nation lands (#2) and the Barry M. Goldwater Air Force Range (#3) would be effective in reducing the incidence of illegal smuggling on those lands and adjacent public lands managed by the BLM. These barriers would not be constructed without prior consultation and approval by authorized officials of those land management jurisdictions. If barrier #3 is not constructed, the BLM would propose constructing three barriers on nearby public lands to cut-off illegal traffic in this area. One barrier located to the southwest of Antelope Peak (#1) on the western boundary of the Table Top Wilderness may require an extension of approximately 700 feet into wilderness to be effective. See the attached map and table for locations and descriptions of site specific projects.

Waste within the Table Top wilderness and adjacent areas of the Sonoran Desert National Monument will typically consist of clothes, back packs, abandoned vehicles, bicycles, plastic trash bags, and gasoline containers. In most cases, motorized access to dump sites will utilize existing smuggling routes and washes. As areas are cleaned of trash/refuse, the unauthorized smuggling routes will be remediated by ripping of illegal routes, vertical mulching, and re-vegetation.

B. Land Use Plan Conformance

Land Use Plan (LUP) Name: *Sonoran Desert National Monument Record of Decision & Approved Resource Management Plan*

Date Approved/Amended: **9/14/2012**

☒ The proposed action is in conformance with the applicable LUP because it is specifically provided for in the following LUP decision(s):

- TM-6.1.1: The use of motorized or mechanized vehicles off designated roads or primitive roads will be prohibited.
- PS-1.1: Identify naturally occurring or manmade public safety hazards on public lands and take appropriate action to protect public health and safety.
- PS-2.1: Investigate all reported hazardous-materials and solid-wastes sites. Plan necessary containment and/or cleanup responses on a case-by-case basis as soon as possible upon report.

☐ The proposed action is in conformance with the LUP, even though it is not specifically provided for, because it is clearly consistent with the following LUP decision(s) (objectives, terms, and conditions):

Insert applicable Land Use Plan Decision(s)

C. Identify applicable National Environmental Policy Act (NEPA) documents and other related documents that cover the proposed action.

Table Top Wilderness Protection and Vehicle Barrier Project, Environmental Assessment No. DOI-BLM-AZ-P040-2010-0004-EA

List by name and date other documentation relevant to the proposed action (e.g. biological assessment, biological optioning, watershed assessment, allotment evaluation, and monitoring report.

Informal Consultation for Proposed Wilderness Protection Vehicle Barriers on the Sonoran Desert National Monument, Pinal County, Arizona.

D. NEPA Adequacy Criteria

- 1. Is the proposed action a feature of, or essentially similar to, an alternative analyzed in the existing NEPA document(s)? Is the project within the same analysis area, or if the project location is different, are the geographic and resource conditions sufficiently similar to those analyzed in the exiting NEPA document(s)? If there are differences, can you explain why they are not substantial?**

The proposed action is both a feature of, and essentially similar to, both action alternatives analyzed by the above-cited document (Table Top Wilderness Protection and Vehicle Barrier Project, Environmental Assessment No. DOI-BLM-AZ-P040-2010-0004-EA). The project is within the same analysis area, and will involve essentially the same type and amount of work.

- 2. Is the range of alternatives analyzed in the existing NEPA document(s) appropriate with respect to the new proposed action, given current environmental concerns, interests, and resource values?**

The range of alternatives analyzed in the above-cited document encompass all actions envisioned under the proposed project, and are appropriate given current, ongoing environmental concerns, interests, and resource values.

- 3. Is the existing analysis valid in light of new information or circumstances (such as, rangeland health standard assessment, recent endangered species listings, and updated lists of BLM-sensitive species)? Can you reasonably conclude that new information and new circumstances would not substantially change the analysis of the new proposed action?**

The BLM is not aware of any new information or circumstances that would substantially change the analysis of the proposed action. The existing analysis continues to be valid for the proposed action.

- 4. Are the direct, indirect, and cumulative effects that would result from implementation of the new proposed action similar (both quantitatively and qualitatively) to those analyzed in the existing NEPA document?**

The direct, indirect, and cumulative effects of implementing the proposed action would be similar to those analyzed in the above-cited environmental assessment.

5. Are the public involvement and interagency review associated with existing NEPA documents(s) adequate for the current proposed action?

Public involvement and interagency review associated with the existing NEPA document includes all know interested parties and is believed adequate for the proposed action.

E. Persons/Agencies/BLM Staff Consulted

<u>Name</u>	<u>Title</u>	<u>Resource/Agency Represented</u>
Dave Scarbrough	Outdoor Recreation Plnr.	BLM – Phoenix District
Rich Hanson	SDNM Monument Manager	BLM—Phoenix District
Lower Sonoran F.O. Staff	Monthly NEPA meeting	BLM-Phoenix District

Note: Refer to the EA/EIS for a complete list of the team members participating in the preparation of the original environmental analysis or planning documents

CONCLUSION:

Based on the review documented above, I conclude that this proposal conforms to the applicable land use plan and that the NEPA documentation fully covers the proposed action and constitute BLM's compliance with the requirements of NEPA.

//signed//
David L. Scarbrough

Leah Baker

//signed//
Richard B. Hanson

11-14-2012
Date

Note: The signed Conclusion on this Worksheet is part of an interim step in the BLM's internal decision process and does not constitute an appealable decision. However, the lease, permit, or other authorization based on this DNA is subject to protest or appeal under 43 CFR Part 4 and the program-specific regulations.

Project Descriptions - Southern Arizona Project: Vehicle Barriers, Route Restoration, and Trash Cleanups.

Map Location	Project Description	Comments
Vehicle Barriers		
1	“Normandy”-style vehicle barrier at wilderness boundary; total length approximately 1,150 feet; up to 750 feet in wilderness.	This barrier would close the western access to a smuggling corridor that passes along the southern base of Antelope Peak. Although through traffic was halted with a barrier constructed near Antelope Peak in 2011, there still are vehicle attempts being made in wilderness at this location. A short barrier will be attempted first; if ineffective, an extension into wilderness would be required.
2	“Normandy”-style vehicle barrier; total length approximately 450 feet.	Requires approval of Tohono O’odham Nation.
3	“Normandy”-style vehicle barrier; total length approximately 500 feet.	Requires approval of U.S. Air Force.
4	“Normandy”-style vehicle barriers (3); total length up to approximately 2000 feet.	To be constructed if #3 is not approved. Three barriers would be required on public lands to cut-off vehicle traffic through this area.
5	“Normandy”-style vehicle barrier; total length approximately 80 feet.	This barrier would block vehicle access to the Table Top Wilderness and Tohono O’odham Nation via a large wash to the south of the Table Top Trailhead.
6	“Normandy”-style vehicle barrier; total length up to approximately 500 feet.	This barrier would block vehicle access to the Lava Flow Trail. It would be located approximately 100 yards within the wilderness boundary near the Lava Flow South Trailhead. In concert with construction of the vehicle barrier, a front-end loader would be used to replace the boulder vehicle obstructions that have been removed from the Lava Flow Trail by smugglers using the trail as a vehicle route.
7	“Normandy”-style vehicle barrier; total length approximately 135 feet.	Located on wilderness boundary. Would block vehicle access to Table Top Wilderness via a large wash north of Black Mountain Well.
8	“Normandy”-style vehicle barrier; total length approximately 135 feet.	Located across Vekol Wash just north of private land.
9	“Normandy”-style vehicle barriers (2); total length approximately 210 feet.	Would block vehicle access to a large wash south of the White Hills.
Route Restoration		
10	Illegally constructed smuggling route in western part of Vekol Valley extending from Tohono O’odham Nation to BLM Route 8007F.	Approximately 5 miles.
11	BLM Route 8007I.	Approximately 1.5 miles.
12	BLM Route 8007G (part).	Approximately 3 miles.

13	BLM Route 8007F (part).	Approximately 3 miles.
14	BLM Route 8027E (part).	Approximately 1.5 miles.
15	BLM Route 8027E (part), BLM Route 8027F (part).	Approximately 1.5 miles.
16	BLM Route 8054A.	Approximately 2 miles.
17	BLM Route 8054B.	Approximately 1.5 miles.
18	BLM Routes 8044A, 8044B.	Approximately 2 miles.
19	BLM Route 8042D.	Approximately 1 mile.
20	BLM Routes 8028B, 8028C, 8028D.	Approximately 3.5 miles.
Boundary with Tohono O'odham Nation		
21-22	Fence repair and cattleguard installation.	Fence remains down due to passage of vehicles. Cattleguards would keep the fence intact, thus helping to restrict livestock movement from the Tohono O'odham nation to public lands.
23-24	Fence repair and cattleguard installation.	If route decommissioning and restoration described above is not effective in deterring smuggling traffic, cattleguards would be installed in an attempt to keep impacts localized.